
TELEPHONE ASSOCIATION OF MAINE

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November 30, 2009

Broadband Initiatives Program, Rural Utilities Service
U.S. Department of Agriculture
1400 Independence Avenue, SW, Stop 1599
Washington, DC 20250

Broadband Technology Opportunities Program
National Telecommunications and Information Administration
U.S. Department of Commerce
HCHB Room 4887, 1401 Constitution Avenue, NW
Washington, DC 20230

Re: NTIA/RUS Request for Information

The Telephone Association of Maine (TAM) is a trade association that represents incumbent local exchange carriers in Maine. TAM offers the following comments in response to the Joint Request for Information issued by the National Telecommunications and Information Administration (NTIA) and Rural Utility Services (RUS) that appeared in the Federal Register on November 16, 2009.

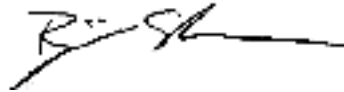
Maine is an extremely rural State with only three cities listed with the U.S. Census bureau as having populations in excess of 30,000 people¹. However, because of the locations of these cities, the current definition of Remote areas from the Notice of Funding Availability (NOFA) renders a large number of very rural areas ineligible for RUS grants. Indeed, for Penobscot County, where Bangor Maine is the County Seat, the population density for the County is 43 per square mile, compared to the national average of 79.6 persons per square mile. This figure of 43 persons per square mile includes Bangor, which has a population density of 913.5 persons per square mile, and is spread over a total of 60 towns. In addition, the median household income for Penobscot County is \$34,274 compared to the national average of \$50,740. While not all of the towns within Penobscot County are within a 50 mile radius of Bangor, the majority of those that are correspond to the low population densities and median household incomes reflected in the County averages. As NTIA and RUS are both aware, the number of households per mile and household incomes are key factors in the economic viability of deploying broadband service in a region. By utilizing a 50 mile "buffer" around cities, RUS is limiting the opportunities of rural providers to bring the advantages of broadband service to their customers.

TAM strongly believes in the goals of the RUS for bringing broadband service to unserved and underserved customers throughout the nation in order to bridge any

¹ As of the most recent data available to the U.S. Census Bureau, Portland Maine has a population of 63,011; Bangor Maine has a population of 31,008; and Lewiston Maine has a population of 35,734.

lingering “digital divides”. However, the current 50 mile “buffer zone” is unnecessarily large and inhibits the ability of the RUS to consider all of the proposals which could benefit unserved and underserved customers in rural areas of the nation. TAM is aware, however, of the need for RUS to balance the resources that it has been allocated with the needs of rural companies throughout the nation. To this end, TAM would propose tightening the definition of “Remote” for RUS grants to any location more than 25 miles away from a municipality with a population of 20,000 or more. This will allow RUS to make grant funds available to more truly rural areas nationwide while still maintaining a meaningful distinction between Remote areas and non-Remote rural areas.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "B. Sanborn", written in a cursive style.

Benjamin M. Sanborn,
Telephone Association of Maine